

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

C.A. No. 1:21-cv-12110-FDS

GOOGLE LLC,

Defendant.

**DEFENDANT GOOGLE LLC'S MOTION TO STAY**

Defendant Google LLC (“Google”) hereby moves to stay this litigation pending completion of *inter partes* review proceedings involving patents related to the patents asserted in this case.

As set forth more fully in the accompanying memorandum of law, this case should be briefly stayed pending final written decisions from the U.S. Patent Trial and Appeal Board (“PTAB”) addressing the patentability of three patents that Plaintiff Singular Computing LLC (“Singular”) has asserted against Google in a related litigation pending in this court. *Singular Computing LLC v. Google LLC*, 1:19-cv-12551-FDS (“*Singular I*”). The PTAB is expected to issue its three final written decisions no later than **May 14, 2022**, and those decisions will have a material impact on both *Singular I* and, by extension, this litigation as well given the close relationship between the patents asserted in each case and the identity of parties and accused products.

WHEREFORE, Google respectfully requests that the Court GRANT this Motion and STAY further proceedings pending final written decisions from the PTAB addressing the patents asserted in *Singular I*.

Date: February 11, 2022

Respectfully submitted,

*/s/ Nathan R. Speed*

---

Gregory F. Corbett (BBO #646394)  
gcorbett@wolfgreenfield.com  
Nathan R. Speed (BBO # 670249)  
nspeed@wolfgreenfield.com  
Anant K. Saraswat (BBO #676048)  
asaraswat@wolfgreenfield.com  
Elizabeth A. DiMarco (BBO #681921)  
edimarco@wolfgreenfield.com  
WOLF, GREENFIELD & SACKS, P.C.  
600 Atlantic Avenue  
Boston, MA 02210  
Telephone: (617) 646-8000  
Fax: (617) 646-8646

Robert Van Nest\*  
rvannest@keker.com  
Michelle Ybarra\*  
mybarra@keker.com  
Eugene M. Paige\*  
epaige@keker.com  
Andrew Bruns\*  
abrunz@keker.com  
Vishesh Narayen\*  
vnarayen@keker.com  
Anna Porto\*  
aporto@keker.com  
Deeva Shah\*  
dshah@keker.com  
Stephanie J. Goldberg\*  
sgoldberg@keker.com  
KEKER, VAN NEST & PETERS LLP  
633 Battery Street  
San Francisco, CA 94111-1809  
(415) 391-5400

Michael S. Kwun\*  
mkwun@kblfirm.com  
Asim Bhansali\*  
abhangsali@kblfirm.com  
KWUN BHANSALI LAZARUS LLP  
555 Montgomery Street, Suite 750  
San Francisco, CA 94111

(415) 630-2350

Matthias A. Kamber\*  
mattiaskamber@paulhastings.com  
PAUL HASTINGS, LLP  
101 California Street  
Forty-Eighth Floor  
San Francisco, CA 94111  
Phone: (415) 856-7050  
Fax: (415) 856-7150

*Counsel for Defendant Google LLC*  
*\*motions for pro hac vice to be filed*

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I, Nathan R. Speed, counsel for Defendant Google LLC, hereby certify that we have conferred with counsel for Singular Computing LLC to resolve or narrow the issues presented in this motion but, after good faith attempt, the parties reached no agreement.

Date: February 11, 2022

/s/ Nathan R. Speed

Nathan R. Speed

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

Date: February 11, 2022

*/s/ Nathan R. Speed*

Nathan R. Speed